## RECEIVED IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA NORTHERN DIVISION

THOMAS C: CREWS,

Plaintiff,

V.

NATIONAL BOAT OWNERS
ASSOCIATION (NBOA) MARINE
INSURANCE AGENCY, INC; MARKEL
AMERICAN LIFE INS. COMPANY; and
JACKIE ASHE, individually and as agent
for the NATIONAL BOAT OWNERS
ASSOCIATION MARINE INSURANCE
AGENCY, INC.,

Defendants.

## SUPPLEMENT TO NOTICE OF REMOVAL

Markel American Insurance Company ("Markel") hereby supplements Exhibit A to its Notice of Removal, filed November 1, 2005, with the attached document.

Respectfully submitted this the 2<sup>nd</sup> day of November, 2005.

One of the Attorneys for Defendant Markel American Insurance Co.

OF COUNSEL:

Alan T. Rogers BALCH & BINGHAM LLP 1710 Sixth Avenue North Birmingham, Alabama 35203-2015 (205) 488-5444

Fax: (205) 488-5775 Email: arogers@balch.com Paul A. Clark (CLA076) G. Lane Knight BALCH & BINGHAM LLP 105 Tallapoosa Street Suite 200 Montgomery, AL 36104-2549 Telephone: (334) 834-6500

Facsimile: (866) 736-3856 E-mail: pclark@balch.com

## **CERTIFICATE OF SERVICE**

I hereby certify that have served a copy of the foregoing by placing a copy of the same in the United States Mail, postage pre-paid, on the following persons on this the 2nd day of November, 2005:

Susan Williams Reeves 714 South 29th Street Birmingham, Alabama 35233-2810

Matthew P. Teague Lloyd, Gray & Whitehead 2501 20th Place South, Suite 300 Birmingham, Alabama 36223

Ms. Jackie Ashe NBOA Marine Insurance Agency 4404 North Tamiami Trail Sarasota, Florida 34234-3864

National Boat Owners Association Marine Insurance Agency 4404 North Tamiami Trail Sarasota, Florida 34234-3864

OF COUNSEL

162369.1

IN THE CIRCUIT COURT OF MONTGOMERY COUNTY, ALABAMA

THOMAS C. CREWS

Plaintiff,

V

CV ~ OS - 2232

NATIONAL BOAT OWNERS
ASSOCIATION (NBOA) MARINE
INSURANCE AGENCY, INC.; MARKEL
AMERICAN INSURANCE COMPANY;
and JACKIE ASHE, individually
and as agent for the NATIONAL
BOAT OWNERS ASSOCIATION (NBOA)
MARINE INSURANCE AGENCY, INC.

Defendants.

SUMMONS

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PCRECOUNT
COUNTY

This service by certified mail of this Summons is initiated upon the written request of plaintiff's attorney pursuant to the Alabama Rules of Civil Procedure.

NOTICE TO: Ms. Jackie Ashe
NBOA Marine Insurance Agency
4404 North Tamiami Trial
Sarasota FL 34234-3864

The Complaint which is attached to this Summons is important and you must take immediate action to protect your rights. You are required to mail or hand deliver a copy of a written Answer, either admitting or denying each allegation in the complaint, Susan Williams Reeves, 714 South 29th Street, Birmingham AL 25233, THIS DATE OF DELIVERY OF THIS SUMMONS AND COMPLAINT AS EVIDENCED BY THE RETURN RECEIPT, OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU also file the original of your Answer with the Clerk of this Court within a reasonable time afterward.

Date 09/07/05

CLERK OF THE COURT Kr